

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*

Plaintiffs,

v.

National Football League and  
NFL Properties, LLC,  
successor-in-interest to  
NFL Properties, Inc.,

Defendants.

Civ. Action No.: 14-cv-00029-AB

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**STIPULATION AND [PROPOSED] ORDER<sup>1</sup>**

This Stipulation and Agreement, dated August [21], 2017, is made and entered into by and among the National Football League and NFL Properties LLC (the "NFL Parties"), Co-Lead Class Counsel, and Counsel for Settlement Class Member Yvonne Sagapolutele ("Sagapolutele") (collectively, the "Parties").

WHEREAS, on April 22, 2015, this Court issued a Memorandum (ECF No. 6509) and Final Order and Judgment (ECF No. 6510), and on May 8, 2015, an

<sup>1</sup> Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

amended Final Order and Judgment (ECF No. 6534), approving the Settlement Agreement in its entirety;

WHEREAS, on August 15, 2017, Sagapolutele filed a Motion to Modify the Amended Final Order and Judgment by Conforming the Definition of "Death with CTE" to the Version Contemplated in the Fairness Hearing Order and Noticed to the Class in the Long Form Notice and Summary Notice Pursuant to Rule 60 and the Authority Retained in the Settlement Agreement (ECF No. 8263) (the "Motion");

WHEREAS, the Parties agreed to extend the deadline for the NFL Parties and Co-Lead Class Counsel to respond to the Motion from August 29, 2017 to September 28, 2017 because of a substantial number of other upcoming deadlines and activities in these MDL proceedings;

**AND NOW**, this [24] day of August, 2017, it is hereby stipulated and agreed by the Parties that the NFL Parties and Co-Lead Class Counsel may respond to the Motion on or before September 28, 2017.

**It is so STIPULATED AND AGREED,**

By: 

Date: August 22, 2017

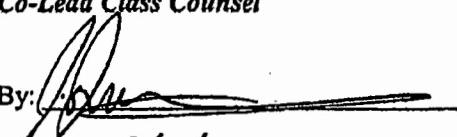
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*Counsel for Yvonne Sagapolutele*

It is so ORDERED, based on the above Stipulation, that the deadline for the NFL Parties and Co-Lead Class Counsel to respond to the Motion is extended from August 29, 2017 to September 28, 2017.



JOSEPH F. LEESON, JR.  
United States District Judge  
FOR ANITA B. BRODY

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